

## FIELD OFFICE CIVIL RIGHTS REVIEW

**Date of Review:**

**District Conservationist:**

**Person Conducting the Review:** Kay T. Cox, State Management Technician, Chattanooga

**Other Persons Participating:**

The official compliance review was performed using the revised "Civil Rights Compliance Review Guide" dated May 4, 2001 and information from the July, 1996 guide. This document and any noted recommendations will serve as the official Civil Rights Compliance Report for the above named Field Office.

CIVIL RIGHTS COMPLIANCE REVIEW GUIDE TITLE VI - PROGRAM DELIVERY		FULL COMPLIANCE		PLANNED FOLLOW- UP DATE	DATE FOLLOW- UP COMPLETE
		(Y/N)	Recommendations		
<b>1. Responsibilities and Records</b> <ul style="list-style-type: none"> <li><i>PDs and Performance Plans automatically contain the proper EEO/CR clauses for all employees</i></li> <li><i>Check if Admin. Coord. has completed file maintenance prior to on site review</i></li> <li><i>Review and discuss with DC past CR reviews &amp; follow-up items</i></li> <li><i>BP must contain state required action (items available from the website)</i></li> </ul>	CR files are maintained, updated and reviewed on a regular basis (to include the last two CR reviews)				
	Business Plans and other operating plans, if applicable, have appropriate CR goals, objectives, action items, etc. <b>AND</b> are being reviewed and documented				
	Staff is available and provides assistance on a nondiscriminatory basis - employees are not participating or providing assistance to any groups or organizations that exclude participation by any person or group				

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<b>2. Training</b>  <ul style="list-style-type: none"> <li>Minimum trng. documentation required: (available from AgLearn history)</li> </ul> <b>FY05-USDA Sexual Harassment</b> <b>USDA Cultural Diversity</b> <b>FY06-TN Diversity Day quiz</b> <b>FY07-No Fear Act</b>  <ul style="list-style-type: none"> <li>Current Review List dated 3/07 (available from website)</li> <li>District personnel need only program delivery trng.</li> </ul>	New employees (hired within the last 12 mos.) have received CR training and it is documented.				
	NRCS staff and District employee training (formal and informal) is documented in the CR files for the last three years				
	List of Items for Annual Review is being utilized by the field office for both CR and EEO informal training (required BP item)				
<b>3. Public Notification</b>  <ul style="list-style-type: none"> <li>Examples: news releases, PSAs, public mtgs., fact sheets, posters, newsletters, electronic media, field days, personal contacts (letters, phone calls, etc.)</li> <li>Do they need material in alternative formats and do they know where to obtain it? (And Justice For All Spanish version)</li> <li>Non-discrimination stmt. – if past history has shown the full stmt. has not been used, recommend short version</li> </ul>	Has <u>NRCS program information</u> been disseminated to potential program beneficiaries and what are the methods used to inform the public? (particularly minorities, females and the disabled)				
	Local media outlets utilized and documented in CR files				
	Grassroots organizations have been identified, have current and appropriate contact information and have been utilized for public notification – annual outreach (required BP item) and when new programs are introduced				
	Non-discrimination statement is used on public notification materials (current statement on most recently produced material)				

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<b>3. Public Notification (cont'd)</b> <ul style="list-style-type: none"> <li><i>Make sure District is not using our statement on their materials</i></li> </ul>	“And Justice For All” Poster prominently displayed where it can be seen by all customers entering the office				
	Civil rights success stories identified and publicized				
	Documented efforts exist to accommodate non-English speaking and disabled customer needs (sign-language and bi-lingual assistance appropriate to the area have been identified)				
<b>4. Outreach</b> <ul style="list-style-type: none"> <li><i>Outreach Policy GM 230-406, NRCS web page, SSI resources (pull stats for the county)</i></li> <li><i>Emphasize the difference between Outreach and Public Notification requirements</i></li> <li><i>Examples of outreach efforts are seeking out customers that have not traditionally participated in programs and directing efforts to those customers</i></li> </ul>	Staff is aware of statistical information for the county (Ag statistics, limited resource and beginning farmer data, etc.)				
	Staff can define Limited Resource and Beginning Farmers in order to explain the program qualifications to a customer				
	Is outreach addressed in NRCS/SCD Business Plan?				
	Have the underserved (specifically women, minorities, limited resource farmers, the disabled and non-traditional clients) been identified and have outreach efforts been planned and/or implemented, if applicable? (for example, farms that may qualify for WRP, but are not participating)				

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<ul style="list-style-type: none"> <li><i>Dec. 2006 memo on working with FSA</i></li> <li><i>Outreach Coord., Aaron Robinson, has been contacted &amp;/or DC has worked with him on specific outreach efforts</i></li> </ul>	Methods of follow-up contact/evaluation exist on outreach activities (are current outreach methods working effectively?)				
<b>5. Complaints of Discrimination</b> <ul style="list-style-type: none"> <li><i>7 statutory bases (race, sex, national origin, color, disability, age, religion) and those added at the discretion of the Secretary</i></li> </ul>	Does the staff know how to process discrimination complaints and where the instructions are located?				
	Do employees know the difference between a program delivery complaint (Title VI of 1964 CR Act) and an equal opportunity complaint (Title VII of 1964 CR Act)				
	Is the field office staff aware of the bases for which a civil rights discrimination complaint can be filed?				
<b>6. Evaluation of Program Delivery</b> <ul style="list-style-type: none"> <li><i>Service Center Information Management System (SCIMS) is being utilized by all USDA service center offices as a customer database</i></li> </ul>	Are potential eligible clients identified or determined by this office?				
	Is there a listing of potential eligible clients and are they coded by race, sex, national origin and disability to the extent practical?				
	Are efforts being made to review program participation information and determine parity/disparity? <i>(required BP item)</i>				

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<b>6. Evaluation of Program Delivery (cont'd)</b>  <ul style="list-style-type: none"> <li>Review PRS parity reports 3.4 and 3.5 – need to correct anything that appears under “no information”</li> <li>Evaluate last three year’s sign-up data from ProTracts participant summary reports and LTP-3s, if applicable, for each NRCS program applicable to the field office- attach to this report</li> <li>Review Cons-6 notes</li> </ul>	Does program participation data reflect participation by women, minorities, and persons with disabilities?				
	Field office assistance, as documented in the field office technical assistance notes and parity reports, indicate employees are working across racial and gender lines. Document findings and reasons for disparity, if applicable				
<b>7. Partnership Responsibility</b>  <ul style="list-style-type: none"> <li>Document SCD Board &amp; local work group’s RSNO for last three years – attach to report</li> <li>Review most current information for election/appointments; should be Feb-March of CY</li> <li>Emphasize the difference of the two CR discussions with the SCD Board: 1. The importance of diversity and recommendation of any names before the election/appointment process</li> </ul>	Does membership on local Conservation District Boards and local working groups reflect the county demographics according to the census data?				
	Documentation exists to reflect annual reminders by the DC to encourage the Board to recruit and/or appoint minorities, females and persons with disabilities to serve on the District Board				
	Documentation exists to reflect annual discussion of the importance and benefits of diversity (required BP item)				
	Minorities and females are on the list of nominees for election/appointment to the SCD Board? (If the demographics reflect minorities and females)				

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<b>7. Partnership Responsibility (cont'd)</b>  <i>2. The CR responsibilities of NRCS and the SCD as outlined in the MA/CWA (done annually)</i>  <ul style="list-style-type: none"> <li><i>How does the field office encourage minorities and females to participate in the electoral process?? (voting for SCD nominees)</i></li> </ul>	Mutual and Cooperative Working Agreements are on file in the field office				
	Documentation exists to reflect annual reviews of the nondiscrimination provisions of the Mutual and Cooperative Working Agreements by the DC (required BP item)				
<b>8. Accessibility</b>  <ul style="list-style-type: none"> <li><i>Accessibility was addressed in the 2004 comprehensive review of the state and specific actions for each office are being addressed by the Administrative Staff</i></li> </ul>	Corrective actions have been taken from the 2004 comprehensive review				
	Field office is free of any clutter that prevents access by the disabled				

CIVIL RIGHTS COMPLIANCE REVIEW GUIDE TITLE VII – EQUAL OPPORTUNITY		FULL COMPLIANCE		PLANNED FOLLOW- UP DATE	DATE FOLLOW- UP COMPLETE
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<b>1. Employee Awareness</b> <ul style="list-style-type: none"> <li>All posters are listed on the required list; check to make sure they are visible to the correct group and can be seen</li> </ul>	Sexual Harassment poster prominently displayed where it can be seen by both customers and employees				
	Field office staff is aware of the TN CR web page and utilize it for information				
	Current TN CR poster (listing DCRO, CRLO, CR Committee Chair and SEPMs) displayed where it can be seen by employees				
	Field office staff is aware of the SEPMs and CR Committee members and their activities				
<b>2. EEO Counseling, Mediation and Complaints</b> <ul style="list-style-type: none"> <li>All posters are listed on the required list; check to make sure they are visible to the correct group and can be seen</li> </ul>	NRCS EEO – Equal Opportunity Counseling poster is displayed where it can be seen by employees				
	USDA Equal Opportunity is the Law poster is displayed where it can be seen by both job applicants and employees				
	Employees understand the EEO counseling and complaint process and know where the instructions are located				
	Employees understand the Mediation process and know how to contact a mediator				